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MEMORANDUM ENDORSED

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June 2, 2023

VIA ELECTRONIC FILING

The Honorable Gregory H. Woods, U.S.D.J. United States District Court Southern District of New York Daniel Patrick Moynihan Unites States Courthouse 500 Pearl Street, Room 2260 New York, New York 10007

RE: The Travelers Indemnity Company v. Starr Indemnity & Liability Company

Docket No. : 1:23-CV-02424-GHW

Our File No. : 03-1895.CVS

Dear Judge Woods:

Our office represents defendant Starr Indemnity & Liability Company ("Starr") in the above-referenced matter. This matter is a declaratory judgment action wherein plaintiff seeks coverage on behalf of its named insured on a commercial general liability policy issued by Starr.

Attached herewith please find a proposed Stipulation and Order Extending Time to Respond to Complaint. Starr seeks an extension of time to respond to the Complaint until July 14, 2023.

Starr's answer is presently due on June 12, 2023. Our office has not yet been provided with all relevant files from Starr, largely due to recent staffing changes and other unforeseen matters, and therefore requires additional time to receive, fully review, and analyze same to determine the merits of plaintiff's claims and Starr's defenses, as well as assess the likelihood of settlement.

The proposed extension is on consent of all parties. There has been one prior request for such an extension made to this Court (original answer date of April 21, 2023 to June 12, 2023).

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The parties additionally request that the Court adjourn the Initial Pretrial Conference, presently scheduled on July 6, 2023 by telephone at 4:00 p.m., to a date and time of the Court's discretion after Starr's time to answer.

We appreciate the Court's time and consideration in this matter.

Respectfully submitted,

KELLY & CURTIS, PLLC

Steven R. Shapiro

Attorneys for Defendant

STARR INDEMNITY & LIABILITY

COMPANY

cc:

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THE TRAVELERS INDEMNITY COMPANY

Defendant's application for an extension of time to answer or otherwise respond to the complaint, Dkt. No. 1, is granted. The deadline for Defendant to answer or otherwise respond to the complaint is extended to July 14, 2023. The parties' June 5, 2023 request to adjourn the initial pretrial conference, Dkt. No. 6, is granted. The initial pretrial conference scheduled for July 6, 2023 is adjourned to July 27, 2023 at 4:00 p.m. The joint status letter and proposed case management plan described in the Court's March 24, 2023 order are due no later than July 20, 2023.

The Clerk of Court is directed to terminate the motion pending at Dkt. No. 14. SO ORDERED.

Dated: June 5, 2023 New York, New York GREGORY H. WOODS
United States District Judge